## LAW OFFICE OF IRENE KARBELASHVILI 1 Irene Karbelashvili, State Bar Number 232223 2 Irakli Karbelashvili, State Bar Number 302971 12 South First Street, Suite 413 3 San Jose, CA 95113 Telephone: (408) 295-0137 4 Fax: (408) 295-0142 5 Attorneys for JULYA SAWATSKY, Plaintiff 6 7 UNITED STATES DISTRICT COURT 8 NORTHERN DISTRICT OF CALIFORNIA 9 10 Case No. 5:15-CV-2621 BLF 11 Civil Rights JULYA SAWATSKY, 12 Plaintiff. STIPULATION AND REQUEST 13 BY THE PARTIES FOR AN 14 ORDER MODIFYING GENERAL ) VS. ORDER 56 TO EXTEND THE 15 **DEADLINE FOR THE PARTIES'** CARL'S JR. RESTAURANTS LLC, a **JOINT SITE INSPECTION; AND** Delaware limited liability company, d/b/a ) 16 [PROPOSED] ORDER THEREON CARL'S JR.; HERMAN FOFADO, an 17 individual, d/b/a CARL'S JR.; MIGUEL JARA, an individual, a/k/a MIGUEL E. 18 JARA, JR.; and DOES 1-10, inclusive, Defendants. 19 20 21 IT IS HEREBY STIPULATED by and between Plaintiff JULYA SAWATSKY 22 ("Plaintiff") and Defendant CARL'S JR. RESTAURANTS, LLC ("Defendant") that the deadline 23 for a joint inspection be continued to, but no later than, November 15, 2015. 24 Pursuant to General Order 56, Plaintiff served Defendant within the required 63 day 25 time period. Defendant filed its answer on July 13, 2015. To accommodate the parties and 26 their respective counsel's schedules, the parties request leave to extend the deadline for the 27 joint inspection to no later than November 15, 2015 and all subsequent deadlines of General 28 Order 56 to be modified accordingly.

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1	The parties are hopeful that the joint inspection will assist them in resolving the issue	
2	of injunctive relief.	
3		
4	Date: September 22, 2015	By /s/ James R. Hawley
5		James R. Hawley, Attorney for Defendant CARL'S JR. RESTAURANTS LLC
6		CARL 5 JR. RESTAURANTS LLC
7		
8	Dated: September 18, 2015	By /s/ Irene Karbelashvili
9   10		Irene Karbelashvili, Attorney for Plaintiff RICHARD C. HENNING
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12		
13	FILER'S ATTESTATION	
14		
15		attest that on September 22, 2015, I, Irene
16	Karbelashvili, received the concurrence of James R. Hawley, Esq. in the filing of this document	
17		By: /s/ Irene Karbelashvili
18		IRENE KARBELASHVILI
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## [PROPOSED] ORDER

## FOR GOOD CAUSE SHOWN, IT IS SO ORDERED:

That the deadline for conducting the joint inspection under General Order 56 is modified so that the deadline is extended to no later than November 15, 2015 and all subsequent deadlines of General Order 56 to be modified accordingly.

IT IS SO ORDERED

Dated: September <u>G</u>, 2015

Hon. Beth Labson Freeman United States District Judge

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